

Dear FCC,

I am a consumer and viewer of digital television, concerned about the slow progress of the transition as well as numerous problems, many of which you are discussing here.

I will try to offer my advice regarding each point you raised:

1 The May 1, 2005 deadline for channel election is quite generous. I might prefer it pulled back to May 1, 2004. People are currently very confused as to what type of antennas to purchase, and delays here only add to everyone's costs, and serve little purpose.

2 Replication and Maximization dates proposed for markets 1-100 for top 4 networks of July 1, 2005 and July 1, 2006 are barely acceptable.

I would suggest July 1, 2004 for the top 1-100 markets top 4 networks. Then July 1, 2005 for all others in markets 1-100 above a certain size, and the July 1, 2006 date for the smaller stations and the rest of the country.

3 Intermediate coverage requirements should not be necessary if the above staggered dates were adopted.

4 Channel clearing should be accelerated for channels 52-69. Stations must remain protected while broadcasting there.

Best way to make this happen is to speed up the transition. Also allow all stations that volunteer to go all digital to do so now. Add some incentives, esp must carry on cable for all of the signal. Then move stations down to the core as space becomes available.

One other point: Stop allowing any new analog stations now, and allow smaller LP and independent stations that will never do HDTV to pair up for digital, cutting their costs, and clearing more of the band.

5 The analog stations should go away as scheduled where possible, and in many cases before. Stations that wish to should be allowed to switch off analog now, provided they have maximized their digital signal, and of course their digital signal must be carried on cable.

The criteria of "Television Market" must mean the area surrounding each station, ie a 70 mile radius from each stations digital transmitter, or some more exact coverage measurement.

Once a Market area is covered by 85% of the digital transmitters broadcasting over the area,

counting those that should be broadcasting digitally over that area, the rules should be declared met.

As to other meanings of the 85% rule, it should be interpreted as already met, since once analog goes off all cable systems must carry the digital, and that covers about 85% of the homes for most areas as well. The above would handle those areas not served by cable.

And as to equipment, it is already generally available for anyone that wishes to purchase it, and tuner prices should be down easily to \$150 or less by then, about the same as I had to spend years ago for a UHF converter box when UHF started up!

7 Simulcast requirements don't seem very useful. Stations should broadcast as they please, but should meet requirements that their digital station is broadcasting something useful (not just test patterns) while their analog station is on the air.

This is important especially for PBS stations, where their demo loops are far more worthwhile than low def programming, while the analog signal remains. Also in Boston with 2 PBS stations, it would be nice if they could mix and match such that one station was always full HDTV with 1 program and the other could full time broadcast 4 sub-channels, including the 2 analog stations' programming. So if the simulcast rule is kept, I would hope something like this would be allowed and encouraged, in place of them each doing 1 SD and 1 degraded HD subchannel each!

8 Assistance to PBS has already been covered by their delayed implementation dates. By speeding up maximization in some areas for commercial stations, some used transmitters, etc should become available to some of these stations.

As mentioned above, encouraging them to turn off the analog now, would save them a great deal of money, especially if they had a lower channel with less power and a new more efficient digital transmitter.

Some Federal funding would be logical as well after the above was done, and if needed.

9 PBS particularly should be encouraged to experiment with multiple lower power transmitters, as well as all stations currently using translators. This needs to be tested now, I assume you mean on-channel repeaters here. If this works well, it could lower the costs for many stations, and provide better coverage for many hilly areas.

10 Don't really like the concept of V-chip, but if required, it should

be supported at least by the time analog starts switching off. But with digital there would be no need for an actual V-chip! So might be a good time to revisit this requirement.

11 Stations should be required to ID themselves by their real broadcast channel and not virtual numbers. Since they are already being used, they could use both numbers during the transition.

When a station picks their final channel, they should be able to start using just that number if they wish.

Once the analog switches off, the digital channel should always be just the actual broadcast channel number.

One exception would be translators if any are still used where the parent and the translator channels would both have to be listed. Hopefully the on-channel repeater concept would make the need of this go away!

12 Public interest requirements for children's programming etc, should apply to all subchannels being broadcast. If a station does not elect to do HDTV the requirements for these should be applied to all sub channels taken together, but the totals amounts required should be increased in proportion to the channel capacity increase or more.

This would be a good time to add to the requirements such as during election periods to require one free sub-channel on each station for political speeches, free to the candidates, as well as political discussion shows. This should be 24 hours a day (or the normal broadcast hours) and therefore able to give equal coverage to every candidate. This would slightly degrade the HDTV signals, but for limited periods, and give the american people another major benefit for free, from the transition to digital. The HDTV loss might be minimized by limiting this to one station's sub-channel for each market, and rotating that on a schedule among all the stations.

13 Whether a station broadcasts HD or multicasts, it should not matter as far as cable rules are concerned, cable must carry everything broadcast, period, except cable right now should be encouraged to drop analog coverage once there is a digital channel they could carry instead. There is no point making cable carry both analog and digital channels for the same station at any point. With some incentives here this would take care of the simulcast requirements issue automatically.

This is especially critical with respect to point 12 above, as well as for PBS stations that multicast during the day, to remain viable.